REMARKS

This amendment, submitted in response to the Office Action dated June 4, 2004, is believed to be fully responsive to each point of objection and rejection raised therein. Accordingly, favorable reconsideration is respectfully requested. Claims 1-20 are all the claims pending in the application.

Claim Rejections - 35 U.S.C. § 103:

Okuda/Nakano/Guillemaud. Claims 1-14, 17, and 18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Okuda (U.S. 6,380,689, hereinafter "Okuda") in view of Nakano (U.S. 6,043,818, hereinafter "Nakano") and Guillemaud (U.S. 5,517,609, hereinafter "Guillemaud").

The Examiner contends that the independent claims 1, 5, 17, and 19 and the dependent claims 2-4, 6-14, 18, and 20 are suggested by the combination of Okuda in view of Nakano and the newly cited reference of Guillemaud.

The Examiner correctly concedes that Okuda fails to teach memory read from the memory unit in a different order for each single predetermined frame or each plural predetermined frames, and wherein the plurality of unit display data are written to the picture displaying unit in an order when the plurality of unit display data are read from the memory unit, such that the display content in the picture displaying unit is different for each predetermined frame or frames. Consequently, the Examiner cites Nakano, a background image with a continuously rotating and functional 3D icon, to make up for this deficiency. However, the Examiner's rejection is not supported for at least the following reasons.

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As shown in Fig. 15, bit-map data of eighteen situations 1 to 18 are prepared in advance as bit-map data for an icon (*see* col. 14, ln. 5-7, Nakano). The bit map data are read and displayed on display memory in the order from No. 1 to No. 18, so that the icon is easily displayed as if it is rotating clockwise (*see* col. 14, ln. 7-10, Nakano). When the shadows are displayed, the image data of both the icon and its shadow are prepared in advance as images 1 to 18 and they are read sequentially and displayed on the display memory (*see* col. 14, ln. 10-13, Nakano). Nakano teaches sequentially reading plural images from the memory thereby displaying the plural images on the display (*see* col. 17, ln. 32-33, Nakano). It is clear that Nakano teaches memory cells read from the memory unit in a specific order from No. 1 to No. 18. By contrast, the claimed invention teaches a plurality of unit display data that is read in a different order from the memory unit for each single predetermined frame or frames.

The Examiner correctly concedes that Okuda, which is a driving apparatus for active matrix type luminescent panels, fails to read memory from the memory unit in a different order for each single predetermined frame or each plural predetermined frames. Consequently, the Examiner cites Guillemaud, a graphics display system using tiles of data, to make up for the above deficiencies. However, the Examiner's rejection is not supported for at least the following reasons.

According to the Guillemaud reference, the sequential order of readout of data from the memory array is fixed by the hardware and firmware of the graphics display system (*see* col. 10, ln. 21-23, Guillemaud). By contrast, the claimed invention teaches a plurality of unit display data that is read in a different order (with a different order of readout) from the memory unit for

each single predetermined frame or frames. Even Fig. 7 of Guillemaud shows a table representing the operation of sequentially reading the stored data, as presented in Fig. 7 from the random access memory (*see* col. 10, ln. 64-66, Guillemaud). Because the raster beam sweeps across the entire screen and then retraces, the data red from the memory array must be presented to the beam modulator of the video display in the proper <u>sequential</u> order for each complete sweep across the screen (*see* col. 10, ln. 53-58, Guillemaud).

Therefore, for at least the reasons set forth above, Applicant submits that the Examiner has failed to establish a prima facie case of obviousness with respect to claims 1-14, 17, and 18. Specifically, Applicant notes that one of ordinary skill in the art would not have found it obvious to combine Okuda, Nakano, and Guillemaud. Even if the above combination was made, the result would not teach each and every feature of the claimed invention because the combined references do not read out a plurality of unit display data in a different order from the memory unit for each single predetermined frame or frames.

The prior art references do not contain any suggestion (express or implied) that they be combined, or that they be combined in the manner suggested to arrive at the claimed invention. Even if combined, the references would not meet the claims. In view of the foregoing, Applicant respectfully requests the Examiner's reconsideration and withdrawal of the above 35 U.S.C. § 103(a) rejection of independent claims 1, 5, 17, and 19. As claims 2-4, 6-14, 18, and 20 further depend on these above claims, Applicant also respectfully submits that these claims are also allowable at least by reason of their dependence.

Okuda/Nakano/Dye. Claims 19 and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Okuda in view of Nakano and Dye (U.S. Pat. Pub. No. 2002/0135585 A1, hereinafter "Dye"). Above, Applicant pointed out that the combined teachings of Okuda and Nakano do not teach a plurality of unit display data that is read in a different order from the memory unit for each single predetermined frame or frames. Dye does not compensate for this deficiency because Dye teaches a windows ID list that is preferably order dependent, i.e., all pointers comprised in the Windows ID list have a relative window priority or depth corresponding to the position of the respective pointer in the Windows ID list (*see* pg. 15, paragraph 189, Dye). Therefore, Dye does not teach memory read in a different order but in a specific order because the pointers have specific positions and the entries are organized according to those positions. Specifically, Applicant notes that one of ordinary skill in the art would not have found it obvious to combine Okuda, Nakano, and Dye. Even if the above combination was made, the result would not teach each and every feature of the claimed invention because the combined references do not read out a plurality of unit display data in a different order from the memory unit for each single predetermined frame or frames. Therefore, the 103(a) rejection of claims 19 and 20 should be withdrawn.

Okuda/Nakano/Guillemaud/Ge. Claims 15 and 16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Okuda in view of Nakano and Guillemaud as applied to claims 1-14 and 17-20 and further in view of Ge (U.S. 5,347,292, hereinafter "Ge"). Specifically, Applicant notes that one of ordinary skill in the art would not have found it obvious to combine Okuda, Nakano, Guillemaud, and Ge. Even if the above combination was made, the result

would not teach each and every feature of the claimed invention because the combined

references do not read out a plurality of unit display data in a different order from the memory

unit for each single predetermined frame or frames. Above, Applicant pointed out that the

combined teachings of Okuda, Nakano, and Guillemaud do not teach do not teach a plurality of

unit display data that is read in a different order from the memory unit for each single

predetermined frame or frames. Applicant respectfully submits that claims 15 and 16 are

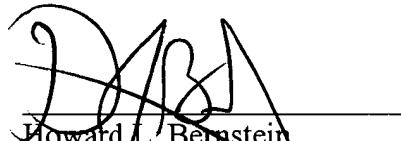allowable by reason of their dependence from independent claims 1 and 5, respectively.

Conclusion:

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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CUSTOMER NUMBER

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